

EDWARD H. KUBO, JR. #2499  
United States Attorney  
District of Hawaii

DARREN W.K. CHING #6903  
Assistant U.S. Attorney  
PJKK Federal Bldg., Room 6-100  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850  
Telephone: (808) 541-2850  
Facsimile: (808) 541-2958  
E-mail: [Darren.Ching@usdoj.gov](mailto:Darren.Ching@usdoj.gov)

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

|                           |   |                               |
|---------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA, | ) | CR. NO. 04-00053 DAE          |
|                           | ) |                               |
| Plaintiff,                | ) | MOTION TO COMPEL DEFENDANT TO |
|                           | ) | PRODUCE DISCOVERY PURSUANT TO |
| vs.                       | ) | FEDERAL RULES OF CRIMINAL     |
|                           | ) | PROCEDURE RULE 16(b)(1)(B);   |
| SILVER JOSE GALINDO,      | ) | MEMORANDUM IN SUPPORT;        |
| aka DANIEL S. GALINDO,    | ) | DECLARATION OF COUNSEL;       |
| aka TIMOTHY MAU,          | ) | CERTIFICATE OF SERVICE        |
|                           | ) |                               |
| Defendant.                | ) |                               |
|                           | ) |                               |

MOTION TO COMPEL DEFENDANT TO PRODUCE DISCOVERY PURSUANT  
TO FEDERAL RULES OF CRIMINAL PROCEDURE RULE 16(b)(1)(B)

Comes now the United States Attorney, on behalf of the plaintiff, United States of America, by and through its undersigned counsel, and hereby moves this Court for an order compelling the defendant, Silver Jose Galindo (Defendant" or "Galindo") to produce discovery pursuant to Federal Rules of Criminal Procedure Rule 16(b)(1)(b).

This motion is made pursuant to Federal Rules of

Criminal Procedure Rule 16(b)(1)(B) and is based on the record and files of this case as well as the Declaration of Darren W.K. Ching.

DATED: February 8, 2008, at Honolulu, Hawaii.

EDWARD H. KUBO, JR.  
United States Attorney  
District of Hawaii

By   
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DARREN W.K. CHING  
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that on the date and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at his last known address:

Served by Facsimile:

JACK SCHWEIGERT, ESQ.  
The Lawyers Building  
550 Halekauwila, Room 309  
Honolulu, HI 96813  
(808) 533-7490

Attorney FOR Defendant  
SILVER JOSE GALINDO

DATED: February 8, 2008, at Honolulu, Hawaii.



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